

Guide for Review of ESG Recipient Management			
Name of Grantee:			
Staff Consulted:			
Program Year:			
Name(s) of Reviewer(s)		Date	

NOTE: All questions that address requirements contain the citation for the source of the requirement (statute, regulation, Consolidated Plan/IDIS, or grant agreement). If the requirement is not met, HUD must make a finding of noncompliance. All other questions (questions that do not contain the citation for the requirement) do not address requirements, but are included to assist the reviewer in understanding the participant's program more fully and/or to identify issues that, if not properly addressed, could result in deficient performance. Negative conclusions to these questions may result in a "concern" being raised, but not a "**finding.**"

Instructions: This Exhibit is designed to review an ESG grantee's management and oversight of its recipients. HUD reviewers should select a sample of recipients for a program year following the instructions for sampling in Section 9-3 in the introduction to this Chapter. The information in the file documentation, supplemented with grantee and recipient staff interviews, is to be used to answer the questions below. If the monitoring is on-site and time and resources permit, HUD reviewers should supplement this review with on-site recipient visits.

Questions:

A. RECIPIENT SAMPLE SELECTION

1.

Complete the table below for the recipient sample. Compare IDIS information with expenditures for those identified. (Add more lines or an additional sheet, if needed.)				
Recipient Name	Program Year	IDIS Project #	IDIS Activity #	Activities Funded

B. RECIPIENT PROGRAM MANAGEMENT

2.

Describe the grantee's procedures for selecting recipients. (Attach copies of written procedures, if available and as applicable.)

[24 CFR 576.61, 24 CFR 576.57(b); 24 CFR 85.12, 24 CFR 85.37 and 24 CFR 85.40]

Describe Basis for Conclusion:

3.

Does the grantee have a management system for the oversight of its recipients?

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[24 CFR 85.40; 24 CFR 576.57(b) and 24 CFR 576.61]

Yes**No****Describe Basis for Conclusion:**

4.

For recipients funded by local government grantees, are the recipients eligible for the program through Internal Revenue Service 501(c)(3) or other status?☐☐☐

[McKinney-Vento Act, 42 USC 11371(5) and 24 CFR 576.3, "Nonprofit recipient"]

Yes**No****N/A****Describe Basis for Conclusion:**

5.

For recipients funded by state grantees, are the recipients eligible for the program through Internal Revenue Service 501(c)(3) or other status?☐☐☐

[McKinney-Vento Act, 42 USC 11371(5) and 24 CFR 576.3, "Nonprofit recipient" and "State"]

Yes**No****N/A****Describe Basis for Conclusion:**

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6.

Has the grantee executed written agreements with recipients to carry out the activities proposed in the grantee's approved Consolidated Plan Annual Action Plan? [24 CFR 85.37; 24 CFR 576.57(b) and 24 CFR 576.61]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Describe Basis for Conclusion: 	

7.

Does a review of recipient written agreements show that the statements of work contain sufficient information regarding the descriptions of the types of supportive services/emergency housing activities that would enable effective grantee monitoring? [24 CFR 85.37 and 24 CFR 576.57(b)]	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: 	

8.

Does the grantee have procedures for determining recipient compliance with applicable program regulations regarding record retention and fiscal management requirements? [24 CFR 576.65(a); 24 CFR 85.20(b); 24 CFR 85.37; and 24 CFR 85.40(a)]	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: 	

9.

Does the grantee have a method for monitoring assigned recipient deadlines for accomplishing project/activity obligation and expenditure dates? [24 CFR 576.35 and 24 CFR 85.40]	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: 	

10.

Does the grantee have a tracking system or other method for ensuring the timely and accurate receipt of recipient information needed for the Consolidated Annual Performance and Evaluation Report (CAPER)? [24 CFR 576.31 and 24 CFR 85.40]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion:		

11.

Does the grantee review recipients for evidence of conflicts of interest <u>both</u> between the grantee and recipients <u>and</u> the recipients and their contractors? [24 CFR 576.57(d)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion:		

C. RECIPIENT FINANCIAL MANAGEMENT

12.

As a condition for receiving ESG funds, does the grantee require, and receive, documentation from its recipients sufficient to ensure that payments are for eligible, actual and incurred expenditures? [24 CFR 576.61 and 24 CFR 85.20]	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Describe Basis for Conclusion:			

13.

Does the grantee's process for reviewing recipients' requests for funds ensure that the ESG payments are not being requested in excess of immediate need? [24 CFR 576.63]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion:		

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14.

a. If indirect costs are charged to the grant program by a subrecipient that is a governmental unit, are the costs supported by an indirect cost proposal prepared in accordance with OMB Circular A-87? [24 CFR 576.57(b)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
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Describe Basis for Conclusion:

b. If indirect costs are charged to the grant program by a recipient that is a nonprofit organization, are the costs supported by an indirect cost proposal prepared in accordance with the OMB Circular A-122? [24 CFR 576.57(b)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
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Describe Basis for Conclusion:

15.

Does the grantee have a tracking system or other method of documenting the need for, and actual submission of, recipient audits required under OMB Circular A-133? [24 CFR 576.57(g)]	<input type="checkbox"/> Yes <input type="checkbox"/> No
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Describe Basis for Conclusion:

16.

Does the grantee have a tracking system or other method of documenting recipient compliance regarding procurement and/or subcontracting requirements? [24 CFR 85.36 and 24 CFR 576.57(b)]	<input type="checkbox"/> Yes <input type="checkbox"/> No
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Describe Basis for Conclusion:

17.

Does the grantee ensure that recipients maintain adequate records for property and assets acquired with grant funds? [24 CFR 84.34(f) or 85.32(d), and 24 CFR 576.57(b)]	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
Describe Basis for Conclusion:		

18.

Is there evidence that the grantee has safeguards for preventing loss, damage, or theft of recipient-held property? [24 CFR 84.34(f) or 24 CFR 85.32(d), and 24 CFR 576.57(b)]	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
Describe Basis for Conclusion:		

19.

Does the grantee have a system or process to identify some recipients as “high risk” for the purposes of conducting on-site or remote monitoring reviews (e.g., recipients unfamiliar with ESG requirements or that have a high staff turnover)? [24 CFR 85.12 and 24 CFR 576.57(b)]	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
Describe Basis for Conclusion:		

20.

If the grantee conducts risk assessments of its recipients, is there evidence to show that the grantee performs compliance monitoring reviews in accordance with the risk assessment results? [24 CFR 85.40 and 24 CFR 576.57(b)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			

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21.

If monitoring discloses recipient deficiencies, does the grantee provide appropriate and necessary follow-up actions to ensure that corrective actions are taken by its recipients? [24 CFR 576.67(b) and 24 CFR 576.57(b)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Describe Basis for Conclusion:	